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12			
13	UNITED STATES DISTRICT COURT FOR THE		
14	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
15	UNITED STATES OF AMERICA,	NO. CR21-071-JLR	
16	Plaintiff,		
17	v.	DEFENDANT MICHAIL WILSON'S SENTENCING MEMORANDUM	
18	MICHAIL WILSON,		
19	Defendant.		
20	INTRODUCTION		
21	INTROD	<del>ecc Hon</del>	
22	Michail Wilson is deeply remorseful and accepts full responsibility for the actions that		
23	bring him before this Court to be sentenced. He recognizes his severe lapses in judgment, an		
24	that he engaged in criminal conduct for which there is no excuse and for which none is offered		
25	His story, however, is also one of redemption; a story of someone who has shown he learne		
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his lesson, and who has demonstrated he can overcome tough circumstances to lead a law abiding and productive life.

Michail, who turns 50 this August, suffered horrific abuse and neglect as child but he managed to build a successful life for himself as a technology worker since moving to Washington in 1998. And due to his interest in technology, he was one of the fortunate few who learned of Bitcoin in 2011 and mined it as a hobby in his off hours back when the price was below \$30. (The price is now approximately \$33,500.) But what was an extraordinary opportunity – one that has legitimately enriched him – soon went very wrong when he established an unlicensed money transmitting business dealing in Bitcoin, the crime to which he pleaded guilty.

In his letter to the Probation Office, which is attached as Appendix A, Michail acknowledges that he acted wrongly, accepts full responsibility for his crime, and is deeply remorseful for his conduct. In addition, the letters from family, friends, and others who have known Michail, which are attached as Appendix B, present a full – and very positive – picture of him, revealing his true character and his commitment to moving forward with resolve to never again take actions like those that have put him before the Court for sentencing.

To be sure, the information presented in this memorandum overwhelmingly evidences that Michail is a good person who overcame long odds and deserves another chance. Those who know him best – including all those who have written letters to the Court – attest to his core goodness, kind heart, and dedication to family, along with their belief in him, willingness to stand by him, and desire to be there for him when he returns to society. As the Probation Office noted in its sentencing recommendation, Michail "has the means and the aptitude to be

a positive member of the community and to be a good father and a good partner." (Probation Office Sentencing Recommendation ("PO Recommendation") at 6.)

Michail is now before the Court to be sentenced as a non-violent offender. Based on the factors set forth in 18 U.S.C. § 3553(a), many compelling sentencing considerations exist which justify a non-custodial sentence. These reasons include:

- Compelling ability thrive personal circumstances, and notwithstanding his horrific childhood;
- Victimization at the hands of numerous hackers;
- Proven good character and exemplary conduct over the last four years;
- The significant amount of funds he agreed to forfeit (with the Bitcoin increasing more than 20-times in value since the date of seizure to over \$40 million at the time of his guilty plea), that serve as strong deterrence; and
- Imposition of custodial sentence would create an unwarranted sentencing disparity in light of a nearly identical prosecution in this district.

Given the specific § 3553(a) factors in this case, the defense respectfully submits that a sentence of home confinement and a substantial amount of community service is a sentence "sufficient, but not greater than necessary" to meet all of the § 3553 sentencing factors.

#### **DISCUSSION**

#### 1. Sentencing Framework

The advisory sentencing guidelines are merely "one factor among the § 3553(a) factors that are to be taken into account in arriving at an appropriate sentence." *United States v. Carty*, 520 F.3d 984, 991 (9th Cir. 2008). "[T]he history and characteristics of the defendant" are considered alongside "the nature and circumstances of the offense." 18 U.S.C. § 3553(a)(1). "The overarching statutory charge for a district court is to 'impose a sentence sufficient, but not

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and provide just punishment; to afford adequate deterrence; [and] to protect the public. . . "

Carty, 520 F.3d at 991.

greater than necessary' to reflect the seriousness of the offense, promote respect for the law,

Here, the Probation Office has agreed with the parties' sentencing guidelines calculation of a total offense level of 19, which results in an advisory sentencing range of 30 to 37 months. (Presentence Report ("PSR") ¶ 88.) Yet, the Probation Office acknowledges that the advisory sentencing guidelines range is too high by recommending a sentence of 12 months plus one day. (PO Recommendation at 6.) Likewise, but for very different reasons, the government is recommending a term of imprisonment of 12 months plus one day. (Government's Memorandum Re Sentencing ("Gov't Memo"), Dkt. No. 21.)

The defense submits that a thorough and fair consideration of all the § 3553(a) factors, however, shows a non-custodial sentence is most appropriate in this case.

### 2. <u>Michail Wilson's Personal History and Characteristics</u>

Pursuant to 18 U.S.C. § 3553(a)(1), in arriving at a sentence that is "sufficient but not greater than necessary" to comply with the purposes of federal sentencing, the Court "should consider the nature and circumstances of the offense and *the history and characteristics of the defendant*." (Emphasis added.)

## a. Michail Endured a Horrific Childhood

Michail was just two years old when his parents separated, and he lived mostly with his mother during his formative years. (PSR ¶¶ 56-57.) But his mother was a heavy drug user and she was unable to hold a job or provide for her family. (*Id.* ¶ 56.). So, Michail's family lived the life of vagabonds – travelling about Arizona and southern California and staying in motels, shelters, campgrounds or the back of the family car. (*Id.* ¶¶ 57, 59) The family rarely had

sufficient money for regular meals, and Michail was often left to beg for assistance or to search for scraps and leftovers. (*Id.*) Without any stable adult in their lives, Michail did what he could to help care for his younger siblings during these early years.

Michail's family situation was further complicated by the fact that his mother lived with an ever-changing cast of boyfriends. (Id. ¶ 60.) And some of these men, perhaps most, were abusive to Michail and his mother. Thus, Michail was repeatedly removed from his mother's custody and placed in foster care. But these arrangements were only temporary, and Michail would be returned to his mother after a time. (Id.) This led to a pattern of great uncertainty and turmoil. Not surprisingly, Michail rarely had the opportunity to settle in any community or to develop lasting friendships.

Michail had infrequent contact with his father, although he would sometimes – albeit infrequently – provide small amounts of financial assistance to the family. (Id. ¶ 57.) Yet, to Michail's surprise, his father returned to his life when he was 12 years old. (Id. ¶ 61.) But any hope that Michail would be able to live with his father in a stable situation was quickly dashed. Initially, instead of staying with his father, Michail was left to stay with his grandmother who was living in a highly abusive relationship herself. Thereafter, Michail was sent to Germany so he could attend an "exchange" program. I (Id.)

When Michail returned to the United States, he was 15 and was left with no adult supervision and very limited resources. Michail lived with and helped to care for his younger brother. As the Probation Office noted:

Mr. Wilson was 15 years old, with no driver's license, no job, and no adult supervision. Mr. Wilson was able to get a car and secured employment at RadioShack. He forged his father's signature so that he could attend school,

<sup>&</sup>lt;sup>1</sup> This was an "exchange" program in name only, as Michail's father sent Michail to Germany but did not house any student, himself.

telling the administration that his father was a paraplegic and couldn't sign the papers himself. He did the same to help his brother get into school. Mr. Wilson had a few friends, but none of them knew the extent to which Mr. Wilson was on his own.

Mr. Wilson and his brother both worked, attended school, and they helped around their apartment complex to secure additional funds. They had no furniture, slept on air mattresses, and used milk crates as tables. Despite these difficulties, both brothers were able to graduate from high school.

(Id.  $\P\P$  62-63.) Soon thereafter, Michail participated in a series of retail burglaries which ultimately led to a period of confinement. (Id.  $\P$  64.)

# b. <u>Michail is Hardworking, Generous, and Always Looking to Help Others</u>

For many persons, this type of chaotic childhood would lead to bitterness, recriminations, and a lifetime of antisocial behavior. But not so for Michail.

After surviving these early years, Michail began to work as a laborer (in a rock pit) and he purchased his first computer. (Id.  $\P$  65.) He met his future wife on an AOL chatroom and he moved to Washington to start his only family. (Id.) Michail's relationships with Jeanine, his now-former wife, and his son are the antitheses of the relationships he endured during his childhood. Michail has worked hard to provide for his family, and he is always present to provide love and support.

After moving to Washington, Michail was hired to work as a system engineer at Technology Express in Auburn. (*Id.*¶¶ 66, 82.) Many of the attached letters of support underscore his computer skills and dedication to his work. Michail has advanced at the company over the years, and he purchased an ownership interest in 2010. He is vital to the company, as a number of the letters address. Like other small business owners, he is concerned the company may falter if he is unable to work for any significant period of time.

Moreover, as reflected in the attached letters, Michail is always willing to help others. His son, Kolten, has explained: "Throughout my childhood I never understood fully why my dad would help everyone that reached out with the only thing in the return being the saying 'they would do the same for me." (Appendix B (Letter of Kolten Wilson at 1).) And, as noted by Debra Padawar:

It's rare that you find people willing to help and put themselves forth in today's age. Often you run into selfish people who scramble and only worry about themselves. Michail has put himself forward offering a hand more in 24 hours than I have had from my own brothers my entire life.

(Id. (Letter of Debra Padawer at 1).)

These support letters, submitted by a broad array of people who know Michail well, echo several consistent refrains. Almost every supporter describes him by using adjectives like "trustworthy," "humble," and "generous." Perhaps most notably, many supporters emphasize that Michail is a person who readily gives to others without asking for anything in return. As one of Michail's friends explained:

Michail offered to help and without it we wouldn't have been able to pay employees, our rent on the salon or our mortgages. Since we opened our business in 2020 we didn't qualify for the PPP or other types of small business loans, without Michail and his generosity we probably would have lost the salon within two months of opening.

(Id. (Letter of Marcus Karlsen).)

But Michail's inherent goodness and compassion is perhaps best exemplified in the letter of his neighbor, Tara Powers, who now works as an educator at Cascade Elementary School. When Ms. Powers was younger and desperate, she stole valuable property from Michail and his family. She explained:

Back in 2014, I was asked to house and dog sit for Michail and his family. I was secretly dealing with an opioid addiction and while Michail and his family

trusted me to be in their house, I made the biggest mistake of my life. Something no matter how hard I try to forget about and no matter how hard I try to forgive myself for, I can't. However, Michail has been able to forgive me even though he had no obligation to. We are not related. I no longer live at my parents' house and I betrayed his trust. It was out of the kindness of his heart he forgave me. In addition, Michail could have decided to press charges against me, but he didn't. He gave me the opportunity to change my life around, ask for forgiveness and take steps in the right direction to receive forgiveness. What I am trying to stay is if it wasn't for Michail's benevolence, things would be a lot different for me and I hope that somehow my letter might make a different that can help Michail.

(*Id.* (Letter of Tara Powers).). In a world that was often hard and cruel toward Michail, he has consistently exhibited the sort of forgiveness, support, and kindness toward others that we often only see in television and movie characters.

# c. After 2011, Michail Became Intoxicated with Bitcoin, Leading Him to Engage in Unlawful Conduct and Causing Him Untold Suffering Due to Unrelated Harassment by Hackers

In 2011, shortly after Bitcoin network was launched, Michail began to "mine" Bitcoin so he could take part in the Bitcoin network. For Michail this was at first a hobby, not an investment strategy, and he has continued to work at Technology Express. But Michail became intoxicated by this new technology, and he unfortunately lost his way when he began trading Bitcoin with others in 2013.

At that time, the rules and guidelines were somewhat ambiguous to a non-attorney, but Michail failed to obtain a state license, register federally, or to set up proper safety protocols even after it became clear that he was acting like a money service business. He also engaged in transactions with an undercover agent over the course of several months who discussed ties with illegal drug activity. This was wrong and Michail is truly remorseful for these serious failings.

Michail, however, did not engage in this conduct to fund a lavish lifestyle. Rather, he viewed these transactions at the time as an extension of his private hobby, and he often made little (if anything) on the transactions. But that is neither an excuse nor a justification for this conduct. Moreover, Michail recognizes that his conduct allowed others to skirt the law and to avoid important regulations. For all of this, Michail has tried to make amends.

Some might understandably think Michail was "lucky" because he discovered Bitcoin in the early years. That is true, in part, but his involvement with this technology has also caused much grief and no end of suffering. As explained by the Probation Office:

At some point, his status and involvement in bitcoin became public and Mr. Wilson began being harassed and extorted. Among other things, he told me that his computer has been hacked repeatedly; he has been emailed his own social security number; his home has been repeatedly "swatted" which occurred after the harassers called the police saying that he was holding his family hostage, resulting in a large police response; a dozen pizzas have been ordered to his house in an hour; he has received death threats and death threats against his family, including his mother who recently died; he received threats to poison his dog; his phone has been repeatedly "SIM swapped" which is where hackers are able to gain access to a phone number and the data held by the phone, including banking, credit card information, and contacts. At one point, someone "spoofed" Mr. Wilson's phone and called his son's school, acting as Mr. Wilson, to warn the school that his son had a gun in his backpack.

(PSR  $\P$  67.) The harassment has caused Michail much suffering and has taken a real toll on the other members of his family.<sup>2</sup>

Michal has reported these crimes to numerous law enforcement agencies to no avail and the harassment continues to this day.

<sup>&</sup>lt;sup>2</sup> In fact, Michail's former wife notes that this harassment led to the end of their marriage. (Appendix B (Letter of Jeanine Wilson).)

#### d. Michail Has Learned from His Mistakes

Michail was first confronted by law enforcement agents more than four years ago. Since then, Michail has clearly demonstrated that he learned from these mistakes and that he will not pose any risk in the future. To the contrary, his conduct has been exemplary. Thus, it is not too surprising that nearly every supporter seems to recognize that Michail has truly learned from his mistakes.

# 3. The Remaining 18 U.S.C. § 3553(a) Factors Support a Non-Custodial Sentence

In arriving at a sentence, that is "sufficient but not greater than necessary" to comply with the purposes of federal sentencing, the Court needs to consider a number of other factors, including: (1) the nature and circumstances of the offense; and (2) the need for the sentence imposed (a) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense, (b) to afford adequate deterrence to criminal conduct, and (c) to protect the public from further crimes of the defendant. 18 U.S.C. § 3553(a). The following is a discussion of how those factors, the most relevant ones here other than his personal history and characteristics discussed above, support a non-custodial probationary sentence.

The nature and circumstances of the offense weigh strongly in favor of the requested sentence. Michail acknowledges that he engaged in criminal conduct and is guilty of a serious criminal offense, a federal felony. In this case, he pleaded guilty to violating 18 U.S.C. § 1960 through his operation of a money transmission business that was not licensed in Washington state and not registered federally. Although there are well-recognized legitimate reasons to be engaged in private Bitcoin transactions despite the government's claim to the contrary (Gov't

Memo at 5), Michail acknowledges his business was an illegal operation. States, like Washington, depend on those operating money transmission businesses to obtain licenses so they can, among other things, monitor those businesses' activities. And complying with the federal registration requirements is equally important for similar reasons.

Michail, of course, does not dispute the importance of such laws and recognizes the serious nature of the offense here. That said, it bears pointing out that this is a non-violent crime, and there are no allegations that Michail defrauded or stole money from anyone, let alone vulnerable victims, to maintain a lavish lifestyle. Indeed, by all accounts he lives – to this day – very modestly despite have substantial resources from legitimate earnings.

Another circumstance of Michail's offense conduct that warrants consideration for a downward variance is the fact that inequal sentences often result when courts apply the guideline section applicable to fraud offenses, U.S.S.G. § 2B1.1, commonly referred to as the "fraud guideline." The fraud guideline is inherently flawed, lacks proportionality, and has no basis in any empirical data. These vagaries have caused courts to recognize and warn about the inequities caused by mechanical application of the fraud guideline.<sup>3</sup>

The 16 loss categories that are set forth in §2B1.1 are not based on any logical policy concerns. The Sentencing Commission has arbitrarily attributed certain loss amounts to trigger an increase in a defendant's offense level. However, these attributions are based on little other than a dollar amount that can mean very little in general, let alone in the context of a rapidly fluctuating cryptoasset, such as Bitcoin. For example, a fraud that involved more than \$6,500 increases the offense level by 2 points, and a loss of over \$15,000 increases it by 4 points.

<sup>&</sup>lt;sup>3</sup> The guidelines refer to §2B1.1, even though there was no actual financial loss and there is no evidence that this offense involved fraud or deceit.

Absent from the fraud guideline is any policy or explanation as to why a difference of \$8,500 doubles the increase in sentencing level. Equally perplexing is the fact that the next 2-point increase does not occur until the fraud causes greater than \$40,000 of loss. Thus, when looking consecutively at two of the sixteen "finely calibrated" categories, an \$8,500 difference in loss amount has equal importance and effect as a \$25,000 difference. Taking this analysis to the extreme, the difference between a scheme involving a loss amount of \$6,500.01 and one involving a loss amount of \$15,000.01 is 4 points. The difference between a scheme involving a loss amount of \$250,000,000.01 and one involving a loss amount of \$550,000,000.01 is also 2 points. As a result, a spread of \$8,500 and \$300 million may have an identical impact on a guidelines calculation. This incongruity is the practical result of essentially random loss attributions made by the Sentencing Commission in \$2B1.1.

The defense respectfully submits that the arbitrariness and unfairness of the fraud guidelines is particularly acute in this case and warrants a downward variance. Fourteen points are added to Michail's offense level based solely on the amount of "loss." This increase results in Michail's sentencing range skyrocketing from 0-6 months to 30-37 months. This increase is the result of the sort of mechanical application of the guidelines that the courts should reject, and without any empirical correlation to his actual conduct.

Michail's case also provides more than adequate deterrence for financially-related and non-violent crimes like his. As part of his plea agreement, Michail agreed to forfeit all Bitcoins that were in any way "involved" with his money service business, which should also act as a deterrent to anyone considering doing what he has done. This far exceeds the value of the transactions discussed in the plea agreement. Specifically, he has forfeited approximately 788 Bitcoins and \$40,000 in cash. The value of the Bitcoins at the time the government seized them

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was approximately \$1,970,000.<sup>4</sup> The value at the time he pleaded guilty on April 19, 2021 was approximately \$44,128,000.<sup>5</sup> This represents a tremendous increase in value, and also a significant level of deterrence, since people engage in the type of crime to which he pleaded guilty to make money and what he agreed to forfeit, approximately \$44,168,000, vastly exceeds the value of the Bitcoin transactions he engaged in, cumulatively.

Turning now to the last pertinent §3553(a) factor, neither imprisonment nor other forms of custody are necessary to protect the public from future crimes. Michail poses the lowest possible risk of recidivism. He has proven this in many ways, including that since the seizure of Bitcoins and funds in June 2017, he has been a law-abiding and productive citizen for a period of nearly four years (which is more than some people this Court sees spend on supervised release). More importantly, as the letters attest, he has demonstrated genuine remorse and has learned the most difficult of lessons from this case. Any form of custody is wholly unnecessary to protect the public. Enabling Michail to remain out of custody to help his immediate and extended family will undoubtedly benefit society far more than imprisoning him for even a brief period of time. Finally, Michail is a small business owner and his company would be placed in a tenuous position if he is away for any significant period of time.

## 4. A Noncustodial Sentence Would Avoid Unwarranted Disparity

Among other things, this Court should attempt to identify a sentence that will "avoid unwarranted disparities." 18 U.S.C. § 3553(a)(6). The defense submits that this case is nearly identical to the situation presented by an earlier case in this District, *United States v. Ong*,

<sup>&</sup>lt;sup>4</sup> Based on the Coindesk price index (www.coindesk.com/price/bitcoin): on July 14, 2017, the price of one bitcoin at the close of the day was approximately \$2,500.

<sup>&</sup>lt;sup>5</sup> Based on the Coindesk price index (www.coindesk.com/price/bitcoin), on April 19, 2021, the price of bitcoin at the close of the day was approximately \$56,000.

CR17-191 (W.D. Wash.). There, after considering the government's recommendation of one year plus a day, Judge Lasnik concluded that there was no need for any additional custodial sentence and Mr. Ong was sentenced to time served followed by a period of supervised release. While some details regarding Mr. Ong's history and characteristics are not public, he did not appear to present many of the mitigating circumstances that are paramount in this case, such as a horrendous childhood and being subjected to ongoing, extreme harassment.

The government has invited the Court to discount the sentence in the *Ong* case by pointing to a few foreign cases and noting that "sentences for these types of offenses have varied." (Gov't Memo at 7 (citing cases).)<sup>6</sup> However, unlike the *Ong* case, these other cases do not appear comparable as they involved advisory guideline ranges well beyond what is presented in this case: *Costanzo* (121-151 months), *Mohammad* (57-71 months), and *Tetley* (46-57 months). Moreover, it is noteworthy that the government recommended substantially longer sentences in these other cases: *Costanzo* (97 months), *Mohammad* (46 months), and *Tetley* (30 months). Finally, although every one of these other defendants received a sentence far below the advisory guidelines range (and far below the sentence the government had

<sup>&</sup>lt;sup>6</sup> The government has miscited the *Campos* case, which is properly identified as *United States* v. *Jacob Burrell-Campos*, CR18-3554-H (S.D. Cal.).

<sup>&</sup>lt;sup>7</sup> We could not identify the precise advisory guidelines range in the *Campos* case as many of the court records remain under seal. However, Campos was initially charged in a 31-count indictment that described extensive and wide-ranging criminal conduct. According to the Department of Justice, the defendant and his confederates purchased more than \$3,290,000 in Bitcoin over a two-year period and also engaged in a structuring scheme as they "imported into the United States, on an almost daily basis, a total of over \$1 million in U.S. currency, in amounts slightly below the \$10,000 reporting requirement." <a href="https://www.justice.gov/usao-sdca/pr/bitcoin-dealer-sentenced-two-years-prison-and-ordered-forfeit-ill-gotten-gains">https://www.justice.gov/usao-sdca/pr/bitcoin-dealer-sentenced-two-years-prison-and-ordered-forfeit-ill-gotten-gains</a>. Thus, *Campos* is completely factually inapposite to this case.

recommended), a review of the available documents suggests that these other defendants could not present the type of mitigating evidence present in this case.

Here, a noncustodial sentence, akin to the sentence imposed in the *Ong* case, is most appropriate and it will avoid an unwarranted disparity.

#### 5. Future Supervision

Michail has been aware of the government's investigation since June 2017, and he has maintained exemplary behavior over the last four years. While the defense does not oppose a period of supervision, some of the special conditions suggested by the Probation Officer – such as specific conditions 1, 2, 3 and 4 – are unnecessary. The defense intends to present further argument regarding these matters at the time of sentencing.

#### **CONCLUSION**

Michail readily acknowledges that his crime represents a tremendous failure on his part. That said, he has accepted responsibility for his conduct, he is sincerely remorseful for what he has done, he will never do anything like this again, and he can be a valuable and contributing member to society. A sentence of home confinement and a significant amount of community service would be sufficient but not greater than necessary to achieve all goals of federal sentencing and fundamental fairness.

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1	DATED: July 12, 2021	Respectfully submitted,
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# APPENDIX A

#### STATEMENT OF MICHAIL WILSON

I was born in Colorado and moved to Washington in 1998, when I was about 27 years old. Since moving here, I have worked fulltime for an Auburn-based technology business, Technology Express, and tried to do my best to help support and care for my son, extended family, and others I know. But more recently I have made serious mistakes and have now entered a guilty plea for running an unlicensed money transmitting business. What started out as an innocent hobby, a natural outgrowth of my lifelong interest in computers and technology, regrettably grew into criminal conduct. I accept full responsibility for all my actions.

I have always taken an interest in computers and technology. Like so many others, I was very excited when I first learned about Bitcoin and other cryptocurrencies. That was in 2011, only two years after Bitcoin network was launched and when cryptocurrencies were considered novel and not many people were using or paying attention to them. This was well before their wide mainstream adoption, and it has been thrilling to see that happen in the last few years, with Bitcoin's price rising to as much as \$60,000. I have always loved that cryptocurrencies were developed through a technological breakthrough and existed solely on the Internet.

Beginning in 2011, I used my own computers to "mine" Bitcoin so I could take part in the Bitcoin network. During these early years, I never saw this as an investment or a financial strategy. At the time, a Bitcoin was worth less than \$30 and dropped far below that at various points. Rather, I viewed my involvement with Bitcoin as a kind of hobby. Again, I had a fulltime job (more than 40-hours per week) at Technology Express, and I never thought that I would earn any real money fromBitcoin. Later, in 2013, when the price was around \$75, I started to trade in Bitcoin. I saw this as an extension of my hobby. While I would sometimes charge a small fee for setting up these trades, I was usually happy if I broke even on most transactions.

When I first became interested in Bitcoin in 2011, there was lots of ambiguity about how the law would treat it. It wasn't until 2013 that a federal agency offered public guidance that cryptocurrencies should be treated like money. Before then, most people I spoke with believed it was probably acceptable to trade Bitcoin without a license. But, as time passed, I realized that many people hoped that Bitcoin would be treated like money. And by 2013 I learned that I was expected to obtain a license (or licenses) if I was acting like a money service business. But to my everlasting regret, I disregarded these legal requirements and continued to trade Bitcoin without any licenses. This was just plain wrong. The licensing requirements and rules governing how to operate a money transmitting business are there for very good reasons, and I should have followed them.

My serious mistakes have impacted the people I care about. I have caused great difficulty for my family and friends, especially my son and girlfriend, both of whom I love dearly. As one of the ways to try to start to make things right again, I have pleaded guilty to operating an unlicensed money transmitting business. Looking back, it is clear my conduct cannot be squared with all that I stand for and the life I have built since moving to Washington. For all of this, I am truly sorry.

MICHAIL WILSON

# APPENDIX B

### **Michail Wilson Support Letters**

#	Name	
1.	Batstone, Cody	
2.	Batstone, Dylan	
3.	Batstone, Joe	
4.	Batstone, Kamron	
5.	Broxson, James	
6.	Broxson, Kendall	
7.	Cleveland, Kathleen	
8.	Conkle, David	
9.	Eichner, Douglas	
10.	Folkinshteyn, Daniel, Ph.D.	
11.	Harris, Marcia	
12.	Harris, William	
13.	Hause, Michael and Donna	
14.	Karlsen, Marcus	
15.	Liu, Holly	
16.	Lopez, Amandajo	
17.	Mabbott, Arlie and Julie	
18.	Miles, John	
19.	Nelson, Marc and Carolyn	
20.	Padawer, Debra	
21.	Padawer, Lindsay	
22.	Padawer, Luke	
23.	Patey, Stewart	
24.	Paulsen, Susan	
25.	Powers, Tara	
26.	Reid, Chris	
27.	Stone, Stacy and Vivian	
28.	Strati, Bruno Carl	
29.	Suryan, Mark	
30.	Wendlandt, Jenni	
31.	Wilson, Bradley	
32.	Wilson, Jeannine	
33.	Wilson, Jerry (Deputy, Retired)	
34.	Wilson, Kolten	
35.	Wilson, Kristin	

June 1, 2021

Honorable James L. Robart
United States District Court
for the Western District of Washington

Dear Judge Robart,

My name is Cody Batstone and the purpose of this letter is to share a few of my cousin Michail's positive impacts on my life. I live in the greater Sacramento area in California with my wife Kamron and daughter K We are a young family and have recently purchased our first home together. I am a small business owner of a painting company and without Michail's wisdom and intelligent advice I am not sure I would be as successful as I am today. Michail has always made himself available by phone or email whenever I asked him for assistance. I have known my cousin Michail all of my life. We weren't very close until I was an adult due to our large age difference.

About 10 years ago I had asked Michail for help with my computer because of his experience with fixing them. He spent hours working on it until he found a solution. This was very generous of him to take his time to help me. This kind act was not the greatest impact he had made on my life but it was the beginning of our very strong relationship going forward. We had grown much closer over the years. The greatest impact comes from his general advice based on his success and failures. His honesty with me about his mistakes he has made and how he would go about fixing them has taught me how to become a better person and man.

I understand that Michail has plead guilty of Conducting an Unlicensed Money
Transmitting business. There is no doubt in my mind that he is regretful of this conduct and it
does not change or affect our relationship in any way. I ask that Michail receives the lowest
possible sentence for his crime because I know Michail will do the right thing going forward.

Sincerely,

Cody Batstone

June 9th, 2021

Honorable James L. Robart
United States District Court
for the Western District of Washington

Dear judge Robart:

I am writing this letter concerning my dear cousin Michail, who has pleaded guilty to the crime of conducting an unlicensed money transmitting business.

My name is Dylan Batstone, and I am a 25-year-old from Lincoln, California. I work as a journeyman painter on new construction homes. Currently, I am living here with my father, Joe Batstone, in Lincoln. In my spare time I enjoy computer games, gold panning, and going to events.

I have known Michail my entire life as he is my Aunt's eldest child. During my lifetime, I have only ever heard good things about him. Although we do not live very close, we have kept in touch through messages, phone calls, and the occasional visit. He has always been there for me when I had questions about computer parts or life in general. He continuously helped out his mother financially despite not being the best of mothers until her passing. Michail has always been a good-hearted individual, from helping out my father with keeping his business afloat to helping out my brother with acquiring a vehicle for his new family. I'm sure that the rest of our family would say the same about him. His son, Kolton, has grown up to be a kind and responsible young adult and I believe this is a direct reflection on Michail's character.

In our discussions over the past couple years, he has expressed remorse regarding his legal circumstances. By no means has his legal situation made me think of Michail any less. I've always looked up to him, not only as my older cousin, but as a smart, genuine, and caring human being as I always will. I hope this letter gives you a better understanding of who Michail is, and I ask of you to consider the most lenient of sentences.

Respectfully,

Dylan Batstone

June 11, 2021

Honorable James L. Robart United States District Court For the state of Washington

To Honorable Judge Robart,

My name is Joe Batstone. I am a painting contractor from Lincoln Ca. I have been in business since 1990 and have been painting since 1981. I have two sons Cody and Dylan who both paint homes as well. We enjoy going on family camp outs and just being outside in the mountains or the ocean.

I am writing this letter to you on behalf of my nephew, Michail Wilson, I have known him for his whole life and am amazed how wonderful of a person he has become. Coming from a very poor welfare family life, he has become a successful business owner, helping his entire family member financially and emotionally. He helped me out very much after my divorce with kind words and reassurance that everything will be ok. Michail has also helped me when business was slow and had vehicle problems by actually buying me a truck so I could continue working. If it were not for Michail I probably wouldn't be in business at this time. He also is a wonderful father to his son Kolten.

Michail has repeatedly told me how remorseful he is for the crime of conducting an unlicensed money transmitting business that he has plead guilty too. I have so much respect for him and is a wonderful human being. Please consider the utmost lenient sentence possible for my nephew Michail on July 20, 2021.

Respectfully,

pu Borns

Joe Batstone

#### Kamron Batstone



6.8.21

Honorable James L. Robart

**United States District Court** 

For the Western District Court

Re: Sentencing of Michail Wilson, Case No. CR20-071JLR

Dear Judge Robart,

My name is Kamron Batstone. I am a Facility Administrator for a Foster Care Agency called Koinonia Homes for Teens. I have worked here for almost 8 years and work every day with youth who are in trouble with the law and who are on probation. I cannot even begin to understand how hard your job is but I thank you tremendously for all the hard work you do to keep us safe.

Michail Wilson is my cousin by marriage. I have known Michail since 2013 when my husband and I got back into contact and began dating. My husband and I have had so many positive conversations and helpful insights into Michail's life and how much he has been able to help us. Michail is a very giving person. He is always looking to be his best self and he is always willing to help out his family. He is consistently talking about how much family means to him and how

important we are to him. I wasn't able to meet Michail at our wedding in 2017 because he is not allowed to leave the State of Washington and that saddened me a great deal. He is the sweetest man with a huge soft side (although he may not look like it)! He has given my husband and me financial advice when we needed it, financial help, and a Ford F150. He reached out to my husband in November of 2020 and said that he had a surprise for us. Michail said he was so proud of my husband for getting his contractor's license, for my husband establishing his own business, for us buying a house in 2019, and for us having a daughter and growing our family that he wanted to give us an extra vehicle for family trips. To this day, every time I enter that truck- I think of Michail and how generous he was to give us such a nice gift and not ever ask for anything in return. Michail has been so gracious and so giving to our family. This is just a glimpse into a small portion of Michail and how providing he is to the ones he loves. He is not the type of person to ask for help but always willing to give it.

Judge Robart- I am asking you to give Michail some grace. He knows what he did was wrong and he has changed his ways. I know you must hear a lot that "they are a changed person or they aren't the same person they used to be" but in this case- it is simply the truth. I believe Michail has sincere regret for the actions he has done and I can only hope and pray that you can give him the lowest appropriate sentence. I want to be able to meet my cousin and thank him for all he has done and given to us. I want him to be able to meet my daughter and be able to get to know her because family is all we have and we need him in our lives. I want him to be able to meet our unborn child and get to know who they are and watch them grow with us.

Thank you so much for taking the time of day to read this. I know you must get a million letters a day but I want you to know that Michail is an amazing person and above all the most giving person I know.

-Kamron Batstone

May, 24, 2021

Honorable James L. Robart
United States District Court
For the Western District of Washington

Re: Michail Wilson sentencing Hearing CR20-071JLR

Dear Judge Robart,

My name is James Broxson and I am a resident of Everett Washington and am partner/owner of Superior Glazing Solutions .

In 2000 I had relocated to Washington and was it difficult to get adjusted to my new life., I was staying with my Mother at the time, she and my Mothers' fiance' John Cleveland introduced me to Michail when he was working for his company, Technology Express.

I am writing on behalf of my longtime friend Michail Wilson whom I have know as a friend for 21 years.

We hit it off with our shared hobby/passion of working on cars .

Michail was much more knowledgeable in dealing with the electronic side of it so I quickly looked to him for advice on those types of projects.

Over the years he's helped me out several times when working on projects that were outside of my understanding as well as repaired or help build my computers countless times with no cost for his expertise and labor as needed while helping to get the needed parts.. He has always done this with NO expectation of anything in return but out of the kindness and generousness of his heart.

He's been at our house for multiple family gatherings including Birthdays, and holidays. As we host a large Thanksgiving celebrations, he has joined us then as well as an extension of our family.

When I was just starting my business 8 years ago he generously provided a place to have our deliveries come to his warehouse at Technology Express because we did not have space yet. This was a big help to us as a new business.

Michail and Kolton joined us at several charity functions and parades supporting the Seattle Drill Team Association and Lake City Vigilantes buying and donating to our causes. This further showed how generous and supportive he has been for years as a friend to our groups and especially our family.

Over the years I've watched Kolton grow up and look up to Michail as a father and he has nurtured and supported Kolton's interests in so many things. Whether it was school projects or competition robots or working on cars he's always been willing to go the extra mile in raising Kolton and provide him support and encouragement in everything he does.

I know that right now business has been tough due to covid and technology Express has required Michails' attention but he never let it take away from the time needed to be there for Kolton.

I don't regard very many people outside of blood relations to be family, but that is how I regard Michail and Kolton, and always will.

As a trusted friend Michail has helped me throughout my life from first moving here, starting a business and even with personal struggles, and I I know I can always count on him.

He's proven to be a loyal and reliable friend.

I respectfully ask that you please consider the most lenient sentence possible for Michail who clearly has expressed regrets for his crime.

Sincerely,

James Broxson

May 24, 2021

Honorable James L. Robart

United States District Court

For the Western District of Washington

Re:

Michail Wilson sentencing Hearing CR20-071JLR

Buop

Dear Judge Robart,

I am writing on behalf of my longtime friend Michail Wilson whom I have know as a friend for 21 years.

My name is Kendall Broxson and I am a 30 year resident of Lynnwood Washington and have been employed as a Supply Chain Analyst at the Boeing Co for just over 13 years. I was introduced to Michail by my fiancé of 5 years John Cleveland (also his longtime friend).

I met Michail when he was working for John Cleveland at Technology Express (which he was once a partner) At that time he impressed me as a very knowledgeable and responsible man with so many talents including his amazing computer skills. He and my Son James hit it off as they shared a love of cars and motorcycles.

Michail has untangled many a problem with our families computers that we just couldn't figure out. He was always ready and willing with no expectation of anything in return, just because he was a friend.

Since I first met him, we have shared many life events including Kolton being born and since then Michail became and still is is a wonderful and loving parent to his Son Kolton who grew up before our eyes.

They have attended many celebrations and gatherings like birthdays, 4<sup>th</sup> of July and kids graduations, Boeing family day open house, Everett Naval Base open house, and Thanksgiving dinner.. We also occasionally just get together just to enjoy dinner with friends. We consider Michail and Kolton an extension of our family.

Over the years I have seen him raise his Son Kolton to be a smart, responsible young man and he has always made him his priority in a loving and caring home. I have seen Michail deeply involved with Kolton on robotics and schoolwork and even taught him to work on cars.. In doing so Kolton looks up to his Dad as his hero and mentor which you can see in their interactions.

Michail is one of the most dependable and helpful friends I have ever known, when we called and asked for help moving or putting on a new roof or siding our house, he and Kolton were there before we knew it pitching in and working as hard as if it was their house rather than just lending a hand. He is truly a special friend and I am proud and honored to call him mine.

The legal issues which Michail has been facing these past few years have not made me question his integrity, or my friendship with him at all. He has said how much he regrets them and how much he wants to attone for his wrongs. In saying that I want to impress upon you that Michail is a caring, hardworking, generous and loving friend and Father.

I am sincerely asking Judge Robart, to consider the most lenient sentence for Michail as the court determines what it appropriate.

Sincerely,

Kendall Broxson

June 9, 2021

Honorable James L Robart United States District Court For the Western District of Washington

I am writing on behalf of my longtime friend Michail Wilson.

My name is Kathleen Cleveland and I live in Wenatchee WA, I just finished school for Engineering.

Michall has been a long time friend of mine and my family since i was just a child. He started working for my dad at Technology Express. He grew through the ranks at the same company and is now part owner of the same company.

Throughout the years he has been loyal, helpful, loving, giving and always there with sound advice and a loke.

I have also seen him as a loving and caring father to Kolten. He has provided a wonderful and growing environment for Kolten to grow up and learn good traits from his elders

Michali has always valued higher education and pushed for his son to go farther in his school, work hard and value what you learn in life. I personally have asked Michall for help with my devices on a number of occasions throughout life. We also bought my first car from him and his ex wife. He is always positive, kind, and honest. He can be called upon at any time because he is extremely loyal and reliable. Michall Wilson is a trustworthy friend.

Lather Clandan

-Kathleen Cleveland

June 1st, 2021

Honorable James L. Robart, United States District Court For The Western District of Washington

Re: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart,

I'm responding to the legal issue that Michail Wilson has with the Federal government over his hobby with Bitcoin. To which he has pleaded guilty for not having a government business license to trade coins and funds from them. I understand that he is going to formal sentencing on July 20th, 2021.

I'm David Conkle a master jeweler and Gemologist. My career started in the 1970's to present. I own and run a manufacturing and full service jewelry business in Everett, Washington. I have two sons who work at the business. I have been in the Everett area since 1974,

My introduction to Michail Wilson goes back to the late 1990's when my company was purchasing our computers from Tech Express which continues to present. He was working as a techperson who help us during our upgrades to our equipment. Over the years he became the head IT person at the company and later manager and then part owner. He has truly become the "go to guy" for anything in that field with an excellent knowledge and skill set to solve problems. He has earned my complete confidence in his handing computers, business software and application sets with 100% follow through. He is trustworthy in the areas of top level security issues including cyber system breaches. In 2006 my company was cyber attacked and our system was left with a blue screen "system dead". The hackers had destroyed my system and databases. Michail made a service call on our system. He recovered the operating system and restore all the data. The hackers were after credit card accounts of our customers to which Michail had set our system up so they were not accessible and saving us from a lawsuit. He then reconfigured our system to prevent this from happening again. This said, he has proven to be an outstanding person in so many different levels.

He is a person whom has worked his life to better himself. Having had a very challenging childhood he has learned from his mistakes. He strives to overcome daily challenges in life to achieve his goals that need to be done. He is the only person I have met that can solve a Rubiks cube in under two minutes and can explain the algorithms it is based on, if you can follow it. Over the years I have gotten to know Michail and his family and especially his son Kolten. His son is very bright and has grown into very good person with a very promising future. They have a very strong bond and share interest in electronics, building some outstanding projects together including a high school science project of a remote control robot that went to the national level competition in Texas.

My concern at this point is for Kolten to lose his father and mentor for years at a very serious moment in his life that can never be undone. Being a single dad is always a huge challenge, I know this

after being single dad with two sons myself. Every day is important with potential consequences and precious time spent as a mentor or dad can make life changing directions for your children.

Michail truly understands the mistake he has made and has been forth coming about what happened and would have surly done things differently he known. I'm asking, Your Honor, to weigh out all the facts and, if at all possible, that the time that Michail would have to serve can be done in a matter that will minimize his separation from his son.

I would also like to note that Michails' business, Technology Express, will be unable to continue because the tech licenses which are in his name. Also he is the driving force within the company. A sad day for all who have grown from their interactions with him and his business. I find it quite challenging to just write this short statement about all he has done for us.

I personally hope that Your Honor can find as lenient solution to this legal situation.

Sincerely

President David Conkle

Jewelers Choice Inc.

June 7, 2021

Honorable James L. Robart United States District Court for the Western District of Washington

RE: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart,

I am writing this letter on behalf of my friend and longtime business associate, Michail Wilson. As you are aware, Michail has plead guilty to the crime of Conducting an Unlicensed Money Transmitting Business. Regardless of that fact, I continue to hold Michail in high regard. I believe him to be one of the most reliable, honorable, contemplative, and trustworthy people I have had the pleasure of interacting with over the last few decades. My name is Douglas Scott Eichner and I am a Certified Public Accountant licensed in the State of Washington.

I grew up here in Bellevue, Washington and have lived, gone to school, and worked in the Greater Seattle area for the better part of the past 50 years. I am a Sammamish High School, Bellevue College, and University of Washington alumni. I first met Michail about 25 years ago at my CPA firm, Eichner & Associates, P.S. At that time we were a fledgling firm and Michail was quickly our outsourced IT department. Over the years I came to rely on Michail to help us with all aspects of our computer systems – from networking to web presence to security, as well as for implementing hardware and software solutions. Time and again, every business interaction I have had with Michail has compounded my respect and admiration for his calming demeanor, his high integrity, his technical knowledge, and his steadfast support. As we worked together our mutual admiration turned into a friendship. Although Eichner & Associates, P.S. closed its doors in 2015, we have remained in contact since - updating each other regarding our sons' lives, discussing the economy and world affairs, and continuing to meet for the occasional Thai lunch despite the hecticness of life today. And yes, to this day, he is the person that I call with any kind of computer or technical issue. Anyway, what I am trying to say is that Michail is truly one of the good guys. If you were to spend any amount of time with him, I know that you would sense that right away. He is genuine, generous and kind. He cares about people and it shows in all aspects of his life.

I will conclude by respectfully asking that you consider the most lenient sentence for Michail that is allowed. He is an exemplary human being and I truly believe that he deserves the lowest sentence the Court considers to be appropriate.

Sincerely,

Douglas S Eichner, CPA

June 3, 2021

Honorable James L. Robart United States District Court for the Western District of Washington

Re: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart,

This letter is in support of my friend, Michail Wilson, who is the subject of the sentencing hearing referenced above.

My name is Daniel Folkinshteyn, and I have been a professor of finance at Rowan University in New Jersey for the past decade. I find being an educator very fulfilling, especially in the field of finance, which puts me in a position to set the young people who come to my classroom on a firm financial footing and help them avoid the suboptimal financial decisions that are unfortunately all too common. I live with my partner of 4 years, and take every chance I get to spend time outdoors with our dog.

I originally got to know Michail about 10 years ago, through our common interest in bitcoin. A lot of the early discussion in the bitcoin community happened on IRC, which is a multi-person messaging platform. The intersection of bitcoin and IRC attracts its share of spammers and scammers, and Michail was one of the volunteers who helped moderate our little community. He has gone the extra mile to build custom tools to track and ban the persistent troublemakers, to help keep the chats friendly and safe for all participants. Without his contributions, I have no doubt quite a few people would have fallen prey to a scam and lost money. Over the years of talking with Michail, I have observed him to be a patient, kind, generous, and capable individual, thoughtful and considerate in his communication, and very caring of the well-being of his son. I believe he is a great asset to his friends, as well as any organizations and communities he's a part of.

Even with his present legal trouble, I am proud to call Michail a friend. In light of the foregoing, I respectfully request that Your Honor consider imposing the lowest sentence permitted under the law.

Sincerely,

Daniel Folkinshteyn, PhD

Daniel Folkingheye

June 1st, 2021

Honorable James L. Robart

United States District Court

For the Western District of Washington

Re: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart,

I, Marcia Harris, am honored to write this testimony on behalf of Michail Wilson. I am now retired from the University of Washington School of Dentistry, where I worked with professors, alumni and graduate students specializing in Orthodontics and Prosthodontics for 33 years. I've known Michail since 2001 when he and his wife moved into a brand-new home across the street from us. Shortly after he moved in, he became the President of the Homeowners Association and did a wonderful job enforcing the guidelines required. This enabled him to build lasting relationships within our community.

In the beginning, our friendship with Michail was mostly special occasions and neighborhood gatherings. As time went on, Michail would come over after work and spend time visiting with my husband and me. He is always welcome and we enjoy his company. As a young man, I admire Michail for having to take on the responsibility of raising his younger brother, Jerry. He became father to Jerry and made sure he stayed in school while providing food and clothes for him.

Michail began working for Technology Express. Over the years, as partners retired, Michail was able to buy their percent of ownership in Technology Express. Now as 50% owner, Michail's responsibilities are managing the employees, performing all the technical work and running the entire company. I feel Michail is an important asset to Technology Express; he has the knowledge, patience, consideration, and understanding of what makes a business successful. Without Michail, the business would most likely fail.

I hold Michail in highest esteem and consider him one of the most generous, knowledgeable and kindhearted human beings. Anyone who knows Michail Wilson is truly blessed.

Thank you Judge Robart for taking the time to read my letter.

Marcina Harris

Sincerely,

Marcia A. Harris

May 17<sup>th</sup>, 2021

Honorable James L. Robart

**United States District Court** 

For the Western District of Washington

RE: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart,

I have been friends with Michail since they moved across the street from us in April of 2001. I'll never forget him coming across the street to introduce himself, not realizing what a good friend he would become! He's always been there for my family in so many ways, and he does it with such grace. I don't know the number of times he's come over to repair my computer, he rebuilt the engine in my daughters vehicle out of the kindness of his heart without charge, and, quite honestly, countless other things that he has helped me with!!

When they moved here, Jeannine was pregnant with Kolten, so I got to witness him growing up. He is a very good kid and a lot of that is the result of good parenting from Michail as a single parent. Kolten depends on his Dad a lot...they're very close!

Michail got a job at a computer place that sells computers to schools and businesses. As he worked there, some of the owners left and he would buy their interest in the business! He now is one of two owners in Technology Express and basically runs the company. There is another owner and several employees. If Michail goes to jail, that business will go out of business and the employees will no longer have gainful employment. It would be a shame.

Michail's legal issues have been weighing heavy on him for longer than a few years now and I truly hope that he doesn't have to spend any time in incarceration. He's a good man with a son that needs him and I am asking you Judge Robart, to please consider the most lenient sentence possible!

Yours Truly,

William M. (Bill) Harris

Silverlake Dental Laboratory

June 3, 2021

Honorable James L. Robart

**United States District Court** 

For the Western District of Washington

Dear Judge Robart,

I am a retired Everett firefighter, and met Michail twenty years ago. The one thing I noticed about Michail is that he is always ready to help. I occasionally worked in marine salvage; at times I needed additional help, and Michail was always willing to work with me. The work was hard and labor intensive. When I called him, he came to work without complaint. As time passed he grew to be a trusted friend.

My wife is a retired Everett teacher who uses the computer regularly. On more than one occasion she has gotten herself into a bind that needed a computer specialist. Michail has willingly came to her rescue and worked on her computer to eliminate viruses and malware. The last time he educated her on the use of a computer to avoid problems. He never asked for compensation for his time and effort. We are blessed to have someone who knows what he is doing and willing to help with computer problems.

My wife and I came to know Michail as a generous and caring man. He is talented and creative in many areas including lighting and music in his home. He is quiet and humble. We appreciate his friendship.

Sincerely,

Michael and Donna Hause



May 25th, 2021.

I'm writing this letter on behalf of Michail Wilson because of how he helped my wife and I this last year. I was introduced to Michail through a friend who thought he could help me with a short term loan. My wife and I opened a Salon last year and things didn't exactly go the way we planned with Covid shutting us down an extra 6 months. When we finally were able to open business wasn't good starting out.

Michail offered to help and without it we wouldn't have been able to pay employees, our rent on the salon or our mortgages. Since we opened our business in 2020 we didn't qualify for the PPP or other types of small business loans, without Michail and his generosity we probably would have lost the salon within two months of opening.

Without a loan this last year would have been completely different, and in as crazy a year as we had Michail was the one person that held out a helping hand and gave us a break. I'll always be grateful for the help, and the trust he had in someone he barely knew.

Sincerely,

Marcus Karlsen



### Pacific Crest Financial Services, LLC

22232 17th Ave SE, Suite 310 Bothell, WA 98021 (425)489-3416

pacificcrestfs.com

June 3, 2021

Honorable James L. Robart United States District Court For the Western District of Washington

Re: Michail Wilson Hearing CR20-071JLR

Dear Judge Robart,

I am writing this letter to you to provide a character reference about Michail Wilson, who I have known for more than 14 years. I provide this reference in full knowledge of Michail Wilson who has pleaded guilty to the crime of Conducting an Unlicensed Money Transmitting Business.

My name is Holly Liu I am a CPA and financial advisor and met Michail Wilson through work. Michail is our IT support and assists us with any computer issues we have.

Michail has been very helpful, dependable, honest, and reliable. We need him around to help solve all the computer issues we have. It would be very difficult for us to find another talented and knowledgeable person like Michail.

Sincerely.

Holly Liu, CPA Financial Advisor

Pacific Crest Financial Services, LLC

June 9, 2021 Honorable James L. Robart United States District Court For the Western District of Washington

Re: Michail Wilson sentencing Hearing CR20-O71JLR

Dear Judge Robart,

I am writing to you on behalf of Michail Wilson whom I have known through my dad, John Cleveland, for 23 years.

My name is Amandajo Lopez I am 32 years old, and I I was born in Seattle and lived in Bellevue until the age of 11 when I moved to Wenatchee Washington and have lived in East Wenatchee since.

I have known Michail most of my life, when he began working for my Dad John Cleveland at Technology Express. He was the computer guy that could help with everything.

He has always been willing to help my family with technology questions. If I called or texted him he would do his best to assist me through the phone. A lot of the time he would advise me to send what I needed looked at, if he wasn't able to help through the phone, to my dad and he would try to fix the problem for me.

Michail has always been a dependable person, and available no matter what you asked him to help with, or he would find the answer. Over the years he been included in family events with my Dad and our family.

The legal issues which Michail has been facing these past few years have not made me question his integrity, or my friendship with him. He has said how much he regrets them and how much he wants to atone for his wrongs. In saying that I want to impress upon you that Michali is a caring, hardworking, generous, and loving friend. I am sincerely asking you, Judge Robart, to consider the most lenient sentence for Michail as the court determines what it appropriate.

Sincerely,

Amandajo Lopez

Arlie	& Julie	Mabbott
0.0		

To the Honorable James L. Robart
United States District Court
For the Western District of Washington

Dear Judge Robart,

We are writing this letter to tell you about Michail Wilson's character and the impact he has on our lives. Arlie and I have known Michail for almost twenty years. He is a great friend to our son, and we can't thank him enough for all the computer work he has done for us personally. Michail has repaired our computer or removed malware from it many times. He never charges anything unless he can convince me to make him a freshly prepared batch of fudge. His generosity is greatly appreciated, especially for a retired couple that lives on a tight budget.

Further, Michail has been invited to several family gatherings in which he is always quick to ask where he can help out and is generous with sharing his knowledge on all subjects. He is the type of person that every family wants to be friends with.

In closing, I would like to point out that even though Michail is going through a difficult time, it does not affect how we will treat him in the future. We will still trust him with the highly sensitive information on our computers. We will still thank him for the impact he has had on our son's life. We will still welcome him with open arms at every gathering. We hope that our words have moved you to be lenient when it comes time to sentence him. He is an important part of our family, and we would like the time away from us to be as brief as possible.

Sincerely,

Arlie and Julie Mabbott

To the Honorable James L. Robart

United States District Court

For the Western District of Washington

RE: Michail Wilson

My name is John "Buddy" Miles, and I have been an employee of Technology Express for the past 29 years. I have been close friends with Michail since 1998, before and after he became an owner in the company. Our friendship hasn't changed during that time. We lived in the same neighborhood, and know him to be one of the most reliable, trustworthy, and honest men I've met. I can't count the times my family has needed his help, whether it's a car, something broken in our home, or a computer issue or family or friends he's been there for us. He's always been a devoted family man, and is a single father. He is a very hardworking person and has done many good things in life as a dutiful person.

I understand the trouble that Michail has found himself in. He has already admitted his wrong doing and regrets it. I feel he has learned a costly lesson from his mistake, and he'll be an even better man in the future from this experience.

I am requesting you to show him some mercy. Any jail time for him would be devastating for his son Kolten, and the employees of Technology Express. I'm certain our doors will close forever if he were to be absent for any amount of time. We all depend on him more than you could know.

I hope you will consider my request and oblige me.

Thank you for your kindness,

John "Buddy" Miles

Budy Mil

## Honorable James L. Robart United States District Court for the Western District of Washington

Re: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart,

We are writing this letter on behalf of our friend, Michail Wilson, who has pleaded guilty to the crime of conducting an unlicensed money transmitting business. He is scheduled for formal sentencing on July 20, 2021

We are Marc and Carolyn Nelson. We live in Lynnwood and I have 3 children and their families living near us with 4 grandchildren and Carolyn has 4 children two of which live in the area and she has 6 grandchildren. I taught Special Education, K-12, severe to moderately handicapped children for 38 years. I have known Michail for about 12 years or so and met him through my wife, Carolyn Nelson who has known him for about 16 years. Michail is the computer specialist who works on the computers where Carolyn works as a dental assistant to Dr. Cottrill and now at the front desk helping patients (Dr. Dwight Cottrill, DDS at Cottrill Cosmetic & Family Dentistry of Mill Creek). Carolyn has worked for Dr. Cottrill for over 33 years and has interacted with Michail over the years many times. When our own personal computer needed immediate care we would call Michail for help. He never refused to offer us help. In fact, we've called him late at night several times and he'd always tell us, "Bring it on over and I'll look at it." Michail has always given us good advice and we always have appreciated his help especially when we knew how busy he was. I can't tell you how precious his help was to us on many occasions especially when our computer was hacked several times. Often Michail would say that there was no charge or he'd give us a very good discount on his services. He'd rather have a home cooked meal from Carolyn than our money. Also, we both have common friends who live across the street from Michail (Bill and Marcy Harris). A couple of times while enjoying our host's company Michail would stop by and he'd be invited in to join us. Michail is friendly and we enjoy his company. Michail has also done a wonderful job as a single father raising his son Kolten who is very genuine and respectful to his peers and father.

We understand that Michail has pleaded guilty to a criminal offense but in no way does this dampen our respect for Michail and we hope that you would be lenient towards Michail and appropriate the lowest sentence permitted under the law.

Most Sincerely,

Marc and Carolyn Nelson

Honorable James L. Robart United States District Court for the Western District of Washington 6/1/2021

Dear Judge Robart,

I'm writing this letter of character on behalf of my friend Michail Wilson. My name is Debra Padawer and I'm a Real Estate agent in Greater New York. I have known Michail for 3 years through my daughter Lindsay.

On a daily basis I have my fair share of people always asking for things. It wasn't more than a few hours until the ride home from the airport from John F Kenny that I first met him. Needless to say, when Michail first walked through my door, a strong looking gentleman with a steel gesture, I wasn't quite sure what to expect.

Upon his arrival I was greeted with a bold smile of Howdy! He would be carrying my daughter's luggage with him up the stairs that lead into the hallways of my home, soon to notice that the electrical panel on the side wall was not functioning any longer. They had not made it 10 minutes into the house before shouting that it looked like he was making a trip to the local Home Depot.

The next morning I had woken up with nearly twenty full boxes of lightbulbs sitting on my countertop, some emptied, some not. The lights were on in my home with different discolorations from the varying luminance that the newer LED lights bulbs make compared to the older incandescent type. This man, who was in my house for no more than 24 hours, not only fixed and repaired the wall outlet, but also decided to replace the older incandescent bulbs in the house to help lower costs. It is no easy feat replacing the bulbs in my home as they are all recessed high hats in an old colonial style house.

Throughout his stay of a week, that would be far from the last of things that were fixed without asking. Our electric garbage disposal had been non-functioning, a leaking gasket in the Hummer, and an oil change; no easy feat, a new outlet installation in our aging kitchen to get with modern times. A pure mechanical genius, and not once did he ask for anything back in return.

It's rare that you find people willing to help and put themselves forth in today's age. Often you run into selfish people who scramble and only worry about themselves. Michail has put himself forward offering a hand more in 24 hours than I have had from my own brothers my entire life.

To say Michail is a humble and generous person is a complete understatement. Not only does he want to help you, but he also takes interest in you as a person and the families around them. He will often bring up random things in the past that you would expect no one to remember, making sure they got accomplished or offering his hand in a time of need.

As a Real Estate agent, trust me when I say I see and deal with A LOT of people on a daily basis. I constantly am bombarded with high maintenance businessmen asking me "Can I see it?", referring to a house, and there are some VERY interesting characters I run across, to put it nicely.

On the way home I find myself driving on the highways asking myself: Where are all the good guys? I understand that Michail has pleaded guilty to operating a money service without a license. My feelings of warmth towards Michail will always be welcomed in my heart. One who offers much interest to my family with a smile will always be welcomed in my home. There are certainly a lot of weird and odd people out there that roam our world; Michail is certainly not one of them. If you can look past the masks we all wear, figuratively and literally speaking, you would be surprised what you can find behind such a noble figure.

No matter where you are in the world you are a video chat away from him for finding a solution to your problem gracefully and humbly. I had hired an electrician to do some work on the house that they could not figure out for one of my recently furnished rooms. In a time of need, Michail had dropped everything he was doing to FaceTime us in order to get my problem resolved despite being in the middle of other important matters.

"Can I see it?" Yes, I see it in Michail. Please take kindly to him. He is an example of what our world needs more of, not less.

Sincerely,

Debra Padawer

June 5th, 2021

Honorable James L. Robart
United States District Court
for the Western District of Washington

Dear Your Honor,

My name is Lindsay Padawer. I've known Michail for over ten years, and has been my rock for nearly three. Of all the places, we met online on a chat service that's nearly two decades old. He was a well respected moderator whose duties were looking out for everyone's well being. This included but wasn't limited to expunging malicious people, protecting the community, and preventing others from harm. Michail had purchased a lamp from me that I designed, unknowing to me at the time that seven years later we would meet and I would find myself wanting to spend the rest of my days with this kind spirited man with a heart of love.

This man before you has curated my New York soul into a level headed, peaceful and patient person. A tamed New Yorker, imagine that? As a native now living on the west coast, I often found myself still in the mindset of a north-easterner. Naturally, my first thought to someone approaching me in my own head was "What do you want?". A true telltale of a city dweller, as one could imagine. That's all since changed. If one could only be so lucky to run across the true spirit of a Noble, Kind, Honest, Generous, Fair, and Loyal human being that pairs with Humility. Your Honor, this person is Michail Wilson.

To say you honor something or someone means, "I find you agreeable to what I believe the epitome of goodness is, and I think society will agree with me when I say this is upstanding". Michail is the first to offer himself before anyone else and is very loyal to his friends and family; he will defend them with his own life. He does not judge a person from their wealth, what they provess nor their social standings -- he is guided by pure ethics and morals.

For what is taken for granted by most of us these days with an endless supply of food and a warm house to go home to, growing up Michail was not as fortunate. A daily ritual of scavenging for food scraps with a single alcoholic parent proves no easy task at the age of seventeen. The nobility of ensuring a brother's survival over your own takes humbleness to the next level of compassion. It didn't end there, though. Years later his brother would ask if he would entertain the idea of taking a test to ensure that they are bound by blood, to worthify the love and devotion he's poured into a man who grew up by his side. "I don't care if we're not bound by blood. You're still my brother." If this is not a true *measure of honor, I really don't know what is*.

Regardless if you are a friend down the street or across state lines, he thinks of you while pushing a grocery cart down the isles of Albertsons. A loaf of bread for a friend next door, a bundle or two of seasoned Rainier Cherries to friends over in another state. Perhaps a hand delivery of a daily newspaper to an elderly man living in hospice for whoms own daughter won't visit for over a year? An open hand and humble heart for those who seek help with their computers or other miscellaneous repairs --- a deck or structure of your roof, a flooded apartment... he seeks no compensation other than a smile. He lurks in the shadows while others casually enjoy their lives, often paying for the meals of our elders at breakfast without thinking twice.

A man is often told throughout their life not to show emotion or feeling while growing up, a tragic suppression of inner turmoil as one progresses through life. Over the last three years I have watched him learn and grow throughout the entirety of this life changing event that has been brought before him. His son Kolten has been raised single-handedly by him, and despite growing up with only a father at his side, he is an exact clone of what one would expect from someone, filled with Enrichment, Nobility, Kindness, Honesty, Generosity, Fairness, and Loyalty.

Michail is one of the smartest people I've ever met -- it's no surprise to me that he would naturally fall into such evolving technology such as Bitcoin. As any electrical engineer or technology enthusiast with a bedroom dedicated to the tinkering of electronics would follow, it was only natural. He is a true believer in the potential for our future and making our world a better place. I'm very aware that Michail has pleaded guilty to those charges put against him. Despite this, my feelings towards him remain unscathed. He's not only *my* person, but one of the best friends I've ever had -- a man I see spending the rest of my days with.

These days it's hard to see and understand one's emotions as we all hide behind our monitors with the COVID pandemic. Often enough the screens between us add an invisible barrier to which makes us human. As he approaches fifty I ask that you please take these words that I've written to heart and to offer this caring soul the least amount of cruelty. Michail is truly a blessing in our lives, someone we all aspire to be. Please don't take this kind and gentle spirit away from us. Without him, a white dwarf lurks in our very precious solar system.

"What is duty against the feel of a newborn son in your arms . . . or the memory of a brother's smile? Wind and words. Wind and words. We are only human, and the gods have fashioned us for love. That is our great glory, and our great tragedy."

- George R.R. Martin, A Game of Thrones

Sincerely,











Honorable James L. Robert United States District Court for the Western District of Washington

June 8th, 2021

Dear Judge Robert,

My name is Luke Padawer, and I am writing this letter to you with great admiration for the position that you hold in our country's judicial system, as well as for the person before you whom you will be sentencing today. I acknowledge that he has pleaded guilty to a criminal offense and do not wish to undermine the severity of such a fact, but wish for you to know that I remain unwavering in my testament to his character. I have known Michail for approximately four years now since dating my sister, and in my 30 years have found his level of ingenuity, generosity, and passion unmatched by even members of my own immediate family (excluding my mother and sister, of course).

His ingenuity and generosity can only be explained as without limit. I myself grew up without a father since the age of four (he passed away), or an older brother, and unfortunately missed out on learning a lot of the handy things in life -- the fields typically male-dominated. Anything I needed help with, such as fixing a garage door, installing an electrical outlet and attic fan, help with our cars, managing computer servers for my small business, and even negotiating for my first car purchase, has cost me nothing but his own time. His willingness to help my aging mother with tasks around the house while he visits has become a legendary topic around the dinner table -- "the guy that knows everything".

Through his ingenuity and generosity, Michail's passion becomes blindingly clear. After only a few moments with him, one can easily determine how much he values learning, improvement, and family. He's a person who stepped up to be an outstanding father for his son, and even for his own siblings. Most importantly, he values imparting his knowledge onto others, even if they may not be closely related. He has become a crucial member of our family, and we are now among many who depend on Michail for his expertise and the time he dedicates to helping others.

The person before you is not just a person who has pleaded guilty to a criminal offence, but also a father, an entrepreneur, a neighbor, and a friend. He is an individual of steadfast character, even in the face of adversity. I believe that all of these facts have value, and it is my hope that these facts will be considered for leniency in your final judgement.

Sincerely,

Luke Padawer

Link

Honorable James L. Robart United States District Court for the Western District of Washington

### Subject: Our friend and Business IT specialist Michail Wilson

Dear Judge Robart:

I wanted to take this opportunity to provide you perhaps a different perspective on my friend Michail Wilson. I own Mattress City Inc. here in the Puget Sound area with 5 retail stores. I started our business back in April 2011 when things were still a bit rocky with the housing bubble issues all of us had to deal with. When I started out we were in dire need of someone who could provide IT services as well as fix and maintain our computers for our company. I was introduced to Michail by another satisfied business friend of ours who highly recommended Michail to us.

From day one, Michail not only helped us expand our business with his expertise in maintaining our computers and networks but assisted us along the way to allow our company to grow. Without his participation in our company I truly believe we would not be where we are now. Not only have we come to rely on him, but the trust we have put in him has never failed us.

Judge Robart, I don't claim to know the details of the law on such matters that are before you at this time but I do know Michail as a friend and business associate. He has operated with the upmost integrity at all times these past 10 years. I will continue to send him our business if the court will allow him the opportunity to serve us and his community. I'm not the judge of anyone but I'm very good at judging ones character and wanted to point out that Michail is a standout individual in my opinion and has a wealth of knowledge in his industry that has helped numerous

people and businesses such as ours. We have entrusted Michail with proprietary information from our industry and at no time have we ever questioned that integrity. When you do business with someone for so many years you build a bond and trust that is difficult to give just anyone else.

On a personal note Judge Robart, On March 13th 2019 I was taken by aid car to Providence Hospital, diagnosed with Sepsis. I was in a coma for over 2 months. 6 1/2 weeks in intensive care. Given a 5% chance to live. During this time since no one had access to all passwords for our company, not even my own family members since I was the only one that had them other than Michail. Michail invested his time to assist my family in a time of crisis to save our company so to speak. I have no words to describe what this meant to our family and company. According to the ICU doctors, a total of 15 people came into the hospital with exactly what I had and I was the only one who survived. (Please see pictures enclosed of my journey) We are greatly indebted to Michail for his self sacrifice in allowing our family to focus on their father getting better while Michail took care of the business computing side for our company. Please provide him grace in your decision is all I ask. Thank you for your investment of time to read my letter with regards to Michail.

Sincerely,

Stewart Patey

President

Mattress City Inc.











Paulsen, Megaard & Co., PS Certified Public Accountants

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June 3, 2021

Honorable James L. Robart United States District Court For the Western District of Washington

Re: Michail Wilson Hearing CR20-071JLR

Dear Judge Robart,

I am writing on behalf of Michail Wilson who is coming up for sentencing on July 21, 2021.

We are a small CPA firm in Bothell, Washington who serve local individual clients and many not-for-profit and health care clients. For the past 10 years Michail has been our computer specialist, responsible for all our computer needs. We have found Michail to be an expert in network systems which is necessary for our firm. We require all our computer systems to be extremely secure to protect our client's data. Our firm prepares Employee Benefit plan audits which require a very high degree of security to protect our client's employee's personal data. We also prepare individual and business tax return which requires us to have a secure, up-to-date system continually operating.

Our firm also manages a nursing facility in Seattle Washington and Michail is the computer specialist for this company as well as the CPA firm. The health care also requires a high degree of security and protection for our nursing home residents and employees. In our health care setting if our server goes down, we cannot access medical records, pharmacy and therapy services. So in this role Michail is vital to our operations. The nursing home system is complicated and requires someone who knows what to do in case of anything going wrong. Michail is vital to keeping this system running.

Michail has always been responsive, discreet and professional in his work ethic. When something goes wrong at the nursing home, he immediately responds to get it fixed. His legal situation is unfortunate however we hope you consider any means possible to allow Michail to continue his work with his clients and be with his son, Kolten.

Sincerely,

Susan Paulsen, CPA, NHA

Paulsen, Megaard & Co, PS

June 6th 2021

Honorable James L. Robart United States District Court For the Western District of Washington

Re: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart,

My name is Tara Powers; I currently work for Washington Alliance for Better Schools as a teacher in the after-school program at Cascade Elementary in Marysville, Washington. I have known Michail for about 20 years. He moved into the house across the street from my parents' house the year I was graduating high school, in 2001. When my parents mentioned they were writing a letter on behalf of Michail, I decided I want to write one too.

In the last 20 years, Michail has helped my family a tremendous amount; from fixing and rebuilding our computers more times than I remember to spending multiple weeks fixing my first car saving me thousands of dollars, which I definitely did not have. I was in college working part time when my car started having engine troubles the first time. Luckily for me, across the street was Michail. Michail graciously found all the parts needed and fixed my car on his free time. He did not ask for anything in return. A year later my car had new issues and Michail came to my rescue again. This time, my car needed a new engine. As a college student working part time, I had no real options. I could not afford to fix it, I definitely did not have the money to buy a "new" used car and I needed a car to get to school and work. Knowing the predicament I was in, Michail volunteered to fixed my car for me again. He found all the parts needed and spent days of his time rebuilding the engine in my car. The only thing he ever asked in return was if I could watch Kolten, his son, for a few hours while he was working on my car. To this day, I do not know anyone (outside of family) who would even consider doing this for someone.

Back in 2014, I was asked to house and dog sit for Michail and his family. I was secretly dealing with an opioid addiction and while Michail and his family trusted me to be in their house, I made the biggest mistake of my life. Something no matter how hard I try to forget about and no matter how hard I try to forgive myself for, I can't. However, Michail has been able to forgive me even though he had no obligation to. We are not related; I no longer live at my parents' house and I betrayed his trust. It was out of the kindness of his heart he forgave me. In addition, Michail could have decided to press charges against me, but he didn't. He gave me the opportunity to change my life around, ask for forgiveness and take steps in the right direction to receive forgiveness. What I am trying to say is if it wasn't for Michail's benevolence, things would be a lot different for me and I hope that somehow my letter might make a difference that can help Michail.

Throughout the years, Michail has joined my family for holidays, birthdays, barbeques and evening chats with my parents. Anytime we have needed Michail's help, he has been there to help us, not asking for anything in return. I appreciate the time you are taking to read this letter and I hope that I have been able to shine some light on the person Michail is.

Sincerely,

Tara K. Powers

Honorable James L. Robart
United States District Court
for the Western District of Washington

Dear Judge Robart,

My name is Chris Reid. I am the owner of a financial planning firm and a fiduciary who met Michail half a decade ago to help him set up life insurance to cover his family. Although I work in financial services now, the circuitous route I took to this profession actually led me through your courtroom years ago. I was an Everett Police officer who arrested a multiple felon in possession of a firearm and drug manufacturing materials that ended up being charged federally and prosecuted by AUSA Nicholas Brown. I can imagine with the number of cases having come before you it does not ring a bell, but I remember being impressed with your demeanor and the way you conducted your courtoom, treating all parties equitably. I was told that you made an off the record comment on the candid and honest nature of my testimony.

It is in the same candid vein that I write this letter. When I met Michail in 2014 he struck me as a good family man who worked hard and was as open and honest as you could ask for. He mentioned his son multiple times and I could tell that Kolten was the reason we were talking.

Since that time Michail has become a friend I can always count on if I need anything. He has helped me out regardless of the time of day, other plans, or circumstances that would have stopped less generous people from lending a hand.

As I have talked with Michail over the past couple years about the circumstances that have led to this point, I have always been baffled by the accusation that he committed any crime, let alone some of the accusations the government is making against him. In working thousands of cases before I left the police department, from street level narcotics to financial crimes, I have developed a pretty good radar for criminal activity. I would have never associated Michail with criminal activity of any sort.

That said, I understand he is pleading guilty, and the matter is settled. This letter is simply to ask you to impose the minimum possible sentence on Michail. Aside from the nature of the crime to which he is pleading, Michail has demonstrated one thing to me above all else; that he cares for and loves his son, and that Kolten is the central point in his life.

Kolten is a great kid who is working full time and taking on the responsibilities of life. His work ethic and other positive qualities owe to Michail's main focus, which is that Kolten mature into a well-rounded man. Michail's one over riding comment to me in our financial planning discussions is that Kolten's character develops irrespective of his economic situation.

Given their financial situation it would have been a simple matter for Kolten to lapse into largess and fail to develop his character.

Because of Michail's influence Kolten works a full time job, pays his taxes, and continues to grow up knowing that he has to live a productive life. Honestly, he is just following Michail's example. I believe there is no governmental interest in confining Michail, at taxpayer expense, and removing him for any amount of time from Kolten's life. Having arrested many criminals, of every stripe, I cannot imagine confinement for Michail to be in society's interest. Whatever debt he owes society has surly been paid through his forfeiture to the government already.

My apologies for being long-winded your honor, I just became a police officer to help good people, and I hate seeing when bad things happen to those same good people. Michail is one of those and if you see fit to impose a lenient sentence it would truly be in the interest of justice, a benefit to Michail's family, and a benefit to society overall.

Thank you for your consideration,

KK

Chris Reid

May 15, 2021

Honorable James L. Robart,
United States District Court
For the Western District of Washington

Re: Michail Wilson Sentecing Hearing, CR20-071JLR

Dear Judge Robart,

We are writing this letter on behalf of our good friend, Michail Wilson, who has pleaded guilty to the crime of conducting an unlicensed money transmitting business. He is scheduled for formal sentencing on July 20, 2021.

We are Stacy and Vivian Stone. Stacy is originally from Vermont, and currently works as a Regional Maintenance Supervisor for Conam, a national multifamily property management company. Vivian is originally from the Chicago area and works as a physician and Section Head of Rheumatology at Virginia Mason Medical Center. We live in Bothell, WA with our son, K and are actively involved in his education and extra-curricular athletic activities. We enjoy hiking, skiing, and generally being outdoors in the Pacific Northwest.

Stacy originally met Michail about 12 years ago while working as a Helicopter flight instructor at Harvey Air Field in Snohomish, Washington. Michail completed his training for his private pilot helicopter rating, under Stacy's instruction. He was a diligent, conscientious, intelligent student, and Stacy and Michail became fast friends. Michael has always been very responsive and helpful whenever we have needed a friend, and it has been a comfort to know we can count on him, as we do not have family in the area. He has maintained his computer hardware business during the entire time we have known him, and he has always been generous with his expertise in this field. We have also watched him raise his son, Kolton, from a young age into a responsible young man. His love for his son is evident in all he does, and Kolton clearly looks up to and adores his father.

The above legal issues have not diminished our respect for Michail in any way. He has expressed regret many times over the past couple of years for his legal situation. He is a kind, generous man, and an excellent friend and father. We respectfully ask you, Judge Robart, to please consider the most lenient sentence for Michail that the Court considers to be appropriate.

- PAne, no

Sincerely

Stacy Stone and Vivian Stone

May 29th, 2021

# Honorable James L. Robart United States District Court for the Western District of Washington

As we get ready to honor our men and women this Memorial Day who selflessly served our country and those who made the ultimate sacrifice for our freedom, I thought it was an appropriate time to write this letter on behalf of my dear friend, Michail Wilson.

I understand Michail has pleaded guilty to a charge of operating a money service business without a license and I would like to say I have never met a kinder, more generous, giving man. Whenever Michail visits, he spends his time taking care of me and tackling projects around my house. I can no longer manage to do myself at my age. I have not once asked Michail for help, he has taken on these tasks through his own volition out of the goodness of his heart.

What is most amazing is his innate knowledge on how to fix anything from broken pinball machines and displays, leaking car sunroofs, inoperable garbage compactors, installation of electrical components/outlets/switches, leaky faucets, car repairs, mechanical issues, and more. He reminds me of a younger version of myself, but I have to admit, he has a few things over me.

I am a 97 year old widower living on my own fortunate enough to still have my wits about me to continue to live what ever time I have left with my family.

I was recently honored as 'Citizen of the Year' by The Town of Harrison in New York where I have resided for the past 97 years.

After I graduated high school, I enlisted and served my country during World War II in the United States Navy, stationed in Kaneohe Bay, Hawaii as an Aviation Ordnance Mechanic serving 18 months as a machine gun instructor loading weapons, bombs, 30 and 50 caliber machine guns on to submarines. I've also loaded PBM and PBX aircrafts with machine gun weapons. These planes were used to patrol submarines. I've almost had my head blown off a few times while looking down the barrel of a loaded weapon. I have seen so much despair and devastation in my lifetime not only in war, but through life itself.

I have been on this earth <u>one century</u> and experienced first hand epic, historic events most can only read about; The Great Depression, World War II, The Korean War, Vietnam, John Glen orbiting the earth, the Civil Rights Act, Neil Armstrong's walk on the moon, JFK's Assassination, The Gulf War, the recent global pandemic and so much more. I have 100 years under my belt, have met my fair share of people both good and bad, and through a lifetime of experience, I can say, I am a good judge of character.

Michail has shown kindness, patience, compassion and concern for my safety and well being. I am asking to please take into consideration not only the charge against Michail but, Michail, the man as a whole and all the good he has done for people like myself, along with many others, when it comes time for him to stand in judgement before you.

'To err is human, to forgive is divine' - Alexander Pope

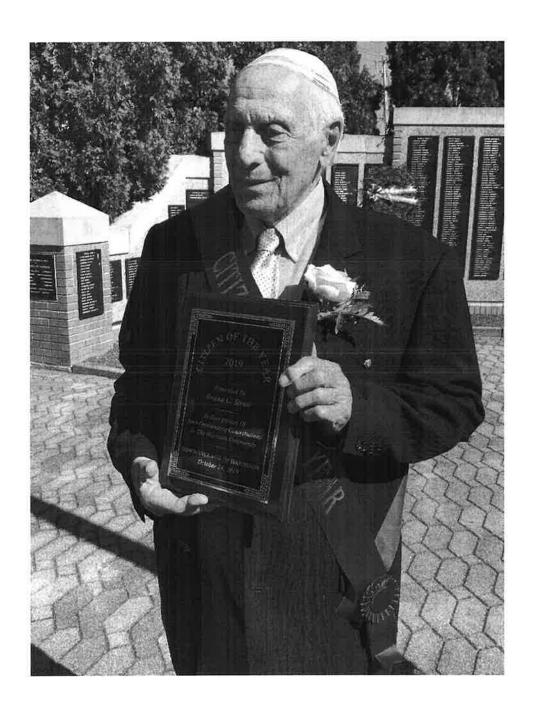
Respectfully yours,

Burno C Strake

Bruno Carl Strati United States Navy Fleet Air Wing 2 - (Retired)







Honorable James L. Robart United States District Court for the Western District of Washington May 28, 2021

Subject: A friend in support of Michail Wilson

Dear Judge Robart:

Michail Wilson is my friend. We have known each other for 21 years. Michail has kept our family's small business IT system alive and well for all of that time period. Over time, we have become very good friends. We communicate about the computer stuff, as necessary; but more importantly we have been to each other's homes on many occasions, we have dined together, we talk about our children, we talk about our partners, we talk about politics, we talk about car stuff. Michail makes himself available when people need him to be. I have noticed this many times in business (with me and with others), with his son, Kolten, and with other relatives in his extended family. He helps people. A famous statement we all learned from Mr. Rogers was, "When there is trouble, find the helpers." Well, Michail is one of those very generous helpers.

I think it was about two years ago that I started asking Michail if I could talk with anyone in his case about who he is to me, to my family and to my business. It was confusing to me that my friend was going through his ordeal with this criminal case, and I had concerns for his wellbeing, his family, his career, and everything else. I have called him on many occasions during this period to check in on him, invite him over, share a meal, etc. He matters to me.

Michail has explained to me what charges he has pleaded to and is not denying the reality that his errant actions have consequences. He acknowledges his guilt. He said to me a few days ago, "Well, I did do that." At that point in that conversation, I was the one angry about what had transpired, and he was calming me down. We are confidents on many levels, and upon reflection, I would have expected nothing less from him.

I wanted to stand up for him. So, having that opportunity now, at this point, is not quite the scenario that I had hoped for. But, as Michail said to me, "Here we are..."

Even under these circumstances, I am glad to stand beside him and to approach the Court to ask for consideration of Michail's high level of personal integrity, trustworthiness, and kind heart, and to ask of the Court that Michail be sentenced to the most lenient possible sentence that is lawful. He is a major asset to his community of people, including me, and we will most assuredly suffer a substantial, tangible collective loss on multiple levels, if he's removed.

Sincerely,

President 4

Dynamark Engineering, Inc.

June 3, 2021

Honorable James L. Robart United States District Court For the Western District of Washington

Re: Michail Wilson Sentencing Hearing, CR20-071JLR

Dear Judge Robart –

My name is Jenni Wendlandt. Michail Wilson has been my neighbor for the last 18 years. Michail also serves on the board of our homeowners association. Michail is very reliable and is always willing to help out when needed. For instance, there is an elderly couple in our neighborhood that Michail helps on a regular basis. As I'm going to and from work I see Michail chatting with them or running something over that they may need.

Michail has helped our family on a number of occasions with computer issues. He is very knowledgeable and is always willing to lend a hand. Michail is very patient and works hard to fix the problems that we throw at him.

I understand that Michail has pleaded guilty to this criminal offense, however; I believe that he is remorseful. I cannot imagine that Michail would do anything that would take him away from his son. Michail is a great dad. I have been witness to his dedication to his son and the love he has for him.

I would ask that you give Michail your lowest appropriate sentence. Michail is a single dad, and he needs to be there for his son.

Thanks,

Jenni Wendlandt

Honorable James L. Robart United States District Court for the Western District of Washington

Dear Honorable Judge Robart,

I write this letter today as a personal reference for Michail Wilson or Uncle Michail as I have known him my entire life. I have known him for my whole 19 years on this planet which does not say much but it does give me insight on things about him I never understood growing up and have just come around to realize. I understand that the case is all but done and my letter does not mean much; but when I was told I could do something to help a man who helped me with something as simple as a letter, I wanted to be sure to do everything that I could. In regards to his character I would describe him as a phenomenal and impactful individual. Throughout my childhood I never fully comprehended everything that he impacted in my life. He was like a person in the background that kept everything moving smoothly. I grew up on the dawn of the computer age and my uncle was always technologically advanced. He helped build my passion into that industry, when I was in middle school he was a heavy factor that moved my curiosity and helped me as I learned my way and built a functioning computer for the first time. I remember more than one call I made asking for advice and help from him. He was always willing to share his knowledge as long as you took the time to listen. This stayed relevant through highschool as I took college classes on CAD and still had to call him up every once and a while just to try and stay ahead of the class. I had some rough patches growing up but even when my family wasn't doing well he would make sure we were still ahead. To this day I still have an old laptop he gave to me when I needed one for school and we couldn't afford it. I know he was a big help in keeping my dad afloat mentaly through his devorce and was always a good person to lean on if you ever needed anything. The more I think about it the more I realize how he was always there even when I never truly showed appreciation. But he has never been a person to do things and expect a return, he has alway done things for people just to be a good person. He was someone who valued family over anything else and that is something that I would love to take from him. Whenever he could, he would come up with an excuse to come see us and just hang out for a while. It was always fun having him right there and seeing what little project or idea he was pondering up and he was always happy to try and explain it to you no matter how lost you were in the last 5 minutes of what he was explaining. I hope that this

letter does not come off poorly. I just wanted to give you an insight to a person I have known all my life in hopes that it helps you to put a personality and a heart to the face of a great man and that you might consider the most lenient sentence permitted. I hope this letter finds you well.

Sincerely, Bradley R. Wilson

Honorable James L. Robart
United States District Court
for the Western District of Washington

Dear Judge Robart,

My name is Jeannine, and I have known Michail for 23 years. We were together for 17 years and 10 of which we were married.

Michail always has been a person that if you needed something, if a tree fell in your yard, oil change or his friends need help with a construction project at home, he was always available to help. In fact, he helped people who took advantage of this. But he did it because he is a good person. Never asking for a favor in return.

Michail was instrumental while our son was in middle school. He became a mentor to our sons' robotics team and held this role for two seasons.

Our neighbors across the street are in their 80's now and took us in like family. He was always available to help, if their adult children couldn't because they did not live close. Time and time again he would fix computer or smart tv problems and help with projects.

Honestly, many people would suffer from frustrations of the tech world, I being one of them, if Michail was not available.

You see, even in our Divorce, I still need him. To be honest, I would be lost without him, because he helps me still in so many ways. Our divorce is not because Michail being a bad person or anything of the sort. It is because of the constant extorsion and death threats we had to put up with going on for years. I simply couldn't handle it anymore and thought they would stop if we parted ways. Unfortunately, they didn't. Quite frankly, I was in fear of what those people might do.

I suffer from chronic anxieties, clinical depression, and fibromyalgia. In our marriage, he kept me grounded / level headed. In our friendship beyond our divorce, when I needed that grounding, his ears were always available and listening.

Currently, our son has decided he wants to learn how to fix cars along with his part time job and going to college. They are on a complete overhaul of a Mazda just to repair and donate to someone in need as Michail has done in the past. Michail is mentoring Kolten (our son) having Kolten do 90% of the work. Kolten is 19 and still needs his dad as a role model. Michail and Kolten are bonding still in Koltens' young adulthood.

Please don't take that away.

Jeannine Wilson

Geannine Wilson 4/3/21

### Honorable James L. Robart

#### **United States District Court**

### for the Western District of Washington

Dear Judge Robart,

My name is Jerry Wilson. I am Michail's brother which in turn means that I have known him longer than anybody, 48 years and counting. As has been said, your sibling is the longest relationship in all of our lives, from the moment the younger one is born until the death of either of them.

I have been trying to think of only one instance whereby my brother has helped me personally and I find it rather difficult to narrow my search to only one. I recall when I encountered a low in my life by way of divorce. This was physically, mentally, emotionally, and financially the most difficult time that I can think of. The first person that I thought to lean on was Michail. He has always been the "glue" that has held the family together. MIchail is always reachable by phone when anybody needs to talk. Michail is a very good listener and offers a different perspective. Michail helped me through that difficult time in my life by showing me love and support, a listening ear, and a shoulder to cry on.

I have spoke to Michail several times as he has been going through this case that has been presented to you. I can hear in his voice that he has genuine remorse for his conduct. I understand that MIchail has entered a plea of guilty in this case. I know that this not only has a personal effect on him, but all of those around him to include his family and yourself as it puts you in a position whereby it becomes your responsibility to find a suitable sentence. Your Honor, I ask from the bottom of my heart that the court considers the lowest allowable sentence permitted by law.

Thank you for taking time out of your day to allow me just one small story about my brother. If I told you about all of the times he has been supportive of me and my family, it would take nearly half of a lifetime to read them all.

Respectfully submitted,

Deputy Jerry K. Wilson (Retired)

June 8th, 2021
Honorable James L. Robart
United States District Court

Dear Judge Robart,

My name is Kolten Wilson. At the time of writing this letter, I am nineteen years old. The person this letter is written for is my father, Michail Wilson. I graduated High school in 2019 seeking computer-aided design and drafting, machining, and programming. I went to college for Precision machining until COVID struct. During my time in high school and leading into College, I looked for help with my academic studies from my father. I currently work part-time at Lowes until I finish college. Without my father helping in paying for college, I wouldn't be able to pay for college, rent, food, and work and wouldn't be able to live on my own.

For most of my life, I grew up with only one parent, my dad. He is the best father figure I could have ever asked for and never would I say that there is something I would change about him. He is the type of person who knows that you can achieve something and will help you get there by giving you advice about what you are doing and teaching you along the way so you can repeat the process on your own. No matter what the situation or scenario you find yourself in, he will always be there to help, if you are willing to sit down and listen to what he has to say and what he thinks. There are many times I remember where we would argue about a simple math problem and both of us would get heated, but come back to it and we both could be entirely wrong about the thing, but you would have never known if you didn't sit down with him and hear what he had to tell you.

Throughout my childhood I never understood fully why my dad would help everyone that reached out with the only thing in the return being the saying "they would do the same for me". I've watched him help build others a deck, shingling a house, installing a magnetic door lock for a jewelry company, helping someone replace their brakes and clutch on an Infiniti, or recently helping me fix up a car we both knew needed repairs.

I've been talking to a therapist for the last few years due to suffering from depression because of the extorsion calls and threats. Between growing up without a mom to support me and the stress of worrying about my dad, it's been difficult for me to function without the extra help. If it wasn't for my dad being in my life, I would have no idea how to survive life. He is one for always pushing my knowledge to the maximum it can be; always trying to push me to do the best I could throughout high school and push for advanced classes to learn more and expand my knowledge. I thrive by living through him, to which I followed exactly in the footsteps of what he did years before I was born.

I ask you to please consider the most lenient sentence the Court considers to be appropriate. My dad is always the person who is willing to learn from mistakes. These last few years have taken a toll on him and I know my dad has pleaded guilty. I know a letter can only offer so much, but, with these words, I can hope it can give you a glimpse into how he's impacted my life.

Kolten Wilson

16 lten Wilson

Honorable James L. Robart

United States District Court

for the Western District of Washington

Dear Judge Robart,

My name is Kirstin Wilson. I am twenty-one years old and am currently working on finishing my bachelor's degree. I am Michail's niece. My uncle has always been involved in my life and is one of the few long-lasting relationships that I have.

My uncle has continuously been one of my strongest supporters for getting a higher education. We frequently talk about how classes are going and what career I might like to pursue. One direct way he has supported my education is by maintaining a functioning computer for me over the years, including before college. This has been especially essential since my last two semesters have been entirely remote. Without his benevolence, going to school would be immeasurably more difficult. His guidance and support have been both practical and inspirational.

Your Honor, I humbly request that the Court consider the lowest appropriate sentence.

Thank you for taking the time to read about an individual influence my uncle has had on my life. I don't relish the thought of where I'd be without him and I'm grateful to him every day.

Respectfully submitted,

Kirstin Wilson